

REMARKS

Claims 1-3 and 6 remain in the application and claim 1 has been amended hereby.

Claim 1 has been amended to correct the misspelling pointed to in the Office Action at paragraph 2.

Reconsideration is respectfully requested of the rejection of claims 1-3 under 35 USC 103(a), as being unpatentable over Karube et al. '050.

The present invention is directed to a semiconductor storage medium device configured to be used as a general purpose memory for storing various types of data having different formats (e.g. still image data, moving image data, music data, etc.)

Features of the semiconductor storage medium device according to the present invention are a controller for controlling access to a first memory based on control information stored in a second memory, wherein the controller operates based on the control information stored in the second memory to store image data and data having a format different from a format of the image data, in the form of a directory structure, in the first memory.

These features of the present invention are recited in currently amended independent claim 1.

It is respectfully submitted that Karube et al. '050 fails to show or suggest controlling the storage of data having different

formats in a first memory based on control information stored in a second memory in the form of a directory structure. Karube et al. '050 is silent about storing data having different formats. Karube et al. '050 is merely teaching the storing of only image data and instructions for controlling only the image data. See FIFO (207 in Fig. 14A) and col. 14, lines 55-57 of Karube et al. '050.

Further, the semiconductor storage medium device according to the present invention is directed to a general purpose memory for holding data having different formats until the data is intentionally deleted by a user. Karube et al. '050 uses a FIFO wherein old data is eventually deleted without user intervention.

Accordingly, it is respectfully submitted that amended independent claim 1, and the claims depending therefrom, are patentably distinct over Karube et al. '050.


Reconsideration is respectfully requested of the rejection of claim 6 under 35 USC 103(a), as being unpatentable over Karube et al. '050 in view of Sanemitsu.

Claim 6 depends from claim 1, which rejection over Karube '050 has been addressed above and, because there are no features in Sanemitsu that somehow could be combined with Karube '050 and result in the presently claimed invention, it is respectfully submitted that claim 6 is patentably distinct over Karube '050 in view of Sanemitsu.

Entry of this amendment is earnestly solicited, and it is respectfully submitted that the amendments made to the claims hereby raise no new issues requiring further consideration and/or search, because all of the features of this invention have clearly been considered by the examiner in the prosecution of this application and because the present amendments serve only to further define and emphasize the novel features of this invention.

Favorable reconsideration is earnestly solicited.

Respectfully submitted,
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